

# **AONest Privacy Policy**

This is the privacy policy of AONest Inc. ("**AONest**", "we", "us" or "our"). This Privacy Policy summarizes what personal information we collect and how we use and disclose this information.

By using our website and/or our web-based AONest software system (collectively, the "**Site**"), you signify your consent to the terms of our Privacy Policy. If you do not agree with any terms of this Privacy Policy, please do not use this Site or submit any personal information to us or use the preference tools we provide to adjust your settings. This Privacy Policy also describes certain choices you have for how we store and use your personal information.

We reserve the right to modify this Privacy Policy at any time. We will reflect any such modifications to this Privacy Policy on our Site. We suggest that you periodically consult this Privacy Policy. Your continued use of the Site after any such changes constitutes your acceptance of this Privacy Policy, as revised.

#### What Personal Information We Collect and How We Collect It.

"Personal Information" is information about an identifiable individual. AONest collects Personal Information when you voluntarily provide it through our Site or when you provide it to us through other means. For example, we may collect Personal Information when you:

- contact us through e-mail, telephone, mail or other correspondence;
- submit an online request to book a meeting;
- subscribe for a service we provide; or
- request an account in our AONest software solution
- register for our mailing list and/or to receive our newsletter.

The Personal Information we may collect will depend on the service you request and may include:

- your full name;
- contact information, such as your address, telephone number, and e-mail address
- courses started and completed;
- page visits on the Site; and
- any other Personal Information that you choose to submit to us.



## How AONest Collects Information Through Technological Means.

When you visit our Site, we may collect information that is automatically sent to us by your web browser. We may use "cookies" and other similar devices on this Site to enhance functionality. The information may include:

- your domain name;
- type of operating system used; and
- your numerical IP address.

We may also collect other information, such as the type of browser you use, which pages you view, and the files you request.

We use this information to:

- better understand how visitors use our Site; and
- to improve our Site to better meet your needs.

The amount of information that is sent by your web browser depends on the browser and settings you use. Please refer to the instructions provided by your browser if you want to learn more about what information it sends to websites you visit or how you may change or restrict this.

If you wish to disable cookies, refer to your browser help menu to learn how. Please note that certain cookies must remain in order to use certain portions of the Services.

#### How AONest Uses and Discloses Personal Information.

The Personal Information we collect may be used by us for the purposes for which it was collected, as provided in this Privacy Policy, or for other purposes that are disclosed to you and to which you consent.

For example, we may use your Personal Information to:

- respond to your inquiries;
- supply you with requested products or services;
- send you informational or promotional communications;
- carry out other purposes that are disclosed to you and to which you consent; and
- carry out any other purpose permitted or required by law.



We may transfer Personal Information to third-party service providers that assist us with carrying out these purposes. These include providers of servers, cloud-based data centres where the platform data is stored, communication services to send out email or reminders and payment processors. We do not sell or trade personal information.

AONest reserves the right to transfer Personal Information in the event that we merge with or are acquired by a third party. We also may disclose your Personal Information for any other purpose required or permitted by law (such as for government request or court order), in order to enforce our legal rights, to enforce security requirements or respond to an emergency situation, or to which you consent.

We may also de-identify your information and aggregate it with the de-identified information of others in order to help us analyze Site usage or AONest software system usage and make appropriate service enhancements.

#### **Your Choices.**

If you receive commercial e-mail from us, you may opt-out at any time using the "unsubscribe" link in such e-mail. By unsubscribing, you will not receive any future promotional or marketing-related email messages from us. You may, however, continue to receive product-related informational email messages.

You also have the option to manage your email preferences by using the "manage preferences" link in any marketing email message. There, you can subscribe or unsubscribe to our various program-specific newsletters, 1-to-1 marketing messages, and all marketing messages.

#### How We Protect Personal Information.

The security of your Personal Information is important to us. We help protect your Personal Information in our control by maintaining industry standard physical, organizational and technological safeguards such as i) encryption and an Secured Sockets Layers (SSL) certificate to ensure information is transmitted over a secured connection between your browser and our web server; ii) data centres with appropriate security and compliance certifications such as SOC 2 and EU-US Privacy Shield that are HIPAA compliant; iii internal protections such as privacy training, password legitimacy in terms of complexity and updates; and requiring password protection for your account with a password set by you. We cannot access or identify your password.



Personal Information may be accessed by persons within our organization who require such access to carry out the purposes described in this Privacy Policy, or such other purposes as permitted or required by law. Personal Information we collect is maintained electronically with the source of the information in our industry-standard secure Customer Relationship Management database.

We retain Personal Information that we collect only as long as necessary for the purposes for which it was collected or to meet legal requirements. We destroy Personal Information when it is no longer needed for such purposes.

It is important to understand that no security measures are absolute. We cannot guarantee the safety of any information you provide to us or of any electronic communication between us.

# We May Transfer Personal Information to Other Countries.

Some or all of the Personal Information we collect may be stored or processed in jurisdictions outside of Canada, including the United States of America. As a result, this information may be subject to access requests from governments, courts or law enforcement in those jurisdictions according to laws in those jurisdictions.

## **Accessing and Correcting your Personal Information.**

You have a right to access your Personal Information and/or to correct it through the capabilities provided in the software system by requesting a correction to it if you believe it is inaccurate. If you have submitted Personal Information and would like to have access to it, or if you would like to have it corrected, please contact us using the contact information provided below. We may require you verify your identity before allowing you to access your personal information.

If we have relied on your consent to use your personal information, you have the right to withdraw that consent at any time by contacting us as noted below.

### **How to Contact Us.**

If you have any questions regarding this Privacy Policy, to submit a complaint, or to access or correct your information, please contact our Privacy Officer at 236 Woodhaven Road, Kitchener, Ontario, N2C IV5, support@aonest.com.